

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

STEPHEN MIDDLEBROOKS,

Plaintiff,

v.

TEVA PHARMACEUTICALS USA, INC.  
and TEVA PHARMACEUTICAL  
INDUSTRIES, LTD.,

Defendants.

Case No.: 17-00412

**INDEX OF EXHIBITS SUBMITTED IN SUPPORT OF  
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

1. Plaintiff's Second Amended Complaint
2. Defendants' Answer and Affirmative Defenses to Plaintiff's Second Amended Complaint
3. Stephen Middlebrooks Deposition
4. Nir Aharoni Deposition (11.29.17 and 11.30.17)
5. Herminia "Mini" Rodriguez Deposition
6. Deposition Exhibit D-19 (Charge of Discrimination filed 11.27.15)
7. Karin Shanahan Deposition
8. Deposition Exhibit D-7 (6.18.14 Email Re: Scope of IFM in NA)
9. Jennifer Flaisher Deposition (1.26.18 and 2.23.18)
10. Deposition Exhibit P-40 (6.13.14 Email Re: Steve Middlebrooks – for discussion with Nir)
11. Deposition Exhibit P-39 (6.18.14 Email Re: IFM workshop – download)
12. Deposition Exhibit P-42 (7.23.14 Email Re: Update call with Nir)
13. Deposition Exhibit P-44 (7.23.14 Email Re: 1:1 with Mini – July 23<sup>rd</sup>)
14. Deposition Exhibit P-46 (7.9.15 Email Re: FM NA – HR topics)

15. Deposition Exhibit P-104 (8.20.14 Email Re: Your Development Plan)
16. Deposition Exhibit P-105 (9.12.14 Email Re: Executive Coach)
17. Deposition Exhibit P-107 (Executive Coach Agreement)
18. Deposition Exhibit P-113 (Executive Coaching Final Report)
19. Deposition Exhibit P-110 (6.11.15 Email Re: Following up – Steve Middlebrooks)
20. Ilanit Shtrouhler Deposition
21. Deposition Exhibit D-8 (2014 Performance Evaluation)
22. Deposition Exhibit P-100 (6.1.16 Email Re: Candidate Recruitment Process Recap – “Senior Director, Facilities Management, NA” Role)
23. Christopher Swartz Deposition
24. John Eppley Deposition
25. Deposition Exhibit D-60 (5.30.15 Email Re: NA FM – Introduction to Planning & Control Workshop – Heads Up!)
26. Deposition Exhibit D-62 (Notes Regarding 6.10.15 Meeting, Group Feedback about Shimrit, Roni & Nir)
27. Troy Gaugler Deposition
28. Deposition Exhibit P-17 (8.3.15 Investigative Report: Hostile Work Environment GFM Team)
29. Deposition Exhibit D-25 (8.3.15 Investigative Report: Hostile Work Environment GFM Team)
30. Leander Jones Deposition
31. Deposition Exhibit P-81 (10.16.15 Email Re: Final Reports)
32. Deposition Exhibit P-16 (10.15.15 Email Re: Confidential: GFM Investigation Summary)
33. Deposition Exhibit P-22 (2.11.16 Email Re: Global Mindset Workshop)
34. Carolyn Tousius Affidavit
35. Deposition Exhibit P-31 (12.15.15 Email Re: PIP Review Meeting)
36. Deposition Exhibit P-26 (10.20.15 Email Re: GFM Investigation Talking Points)

37. Deposition Exhibit P-55 (10.16.15 Email re: mid-year notes)
38. Deposition Exhibit P-14 (2014 Performance Evaluation)
39. Deposition Exhibit D-5 (6.17.14 Email Re: Review of IFM Meeting)
40. Deposition Exhibit P-50 (9.25.15 Email Re: GFM Investigation Update with Nir)
41. Deposition Exhibit P-28 (11.13.15 Email Re: Formal Response to the PIP)
42. Deposition Exhibit P-27 (10.29.15 Performance Improvement Plan)
43. Deposition Exhibit P-35 (10.2.16 Performance Improvement Plan Summary)
44. Deposition Exhibit P-60 (1.14.16 Email Re: FM NA)
45. Deposition Exhibit D-13 (11.13.15 Email Re: Formal Response to PIP document)
46. Deposition Exhibit D-14 (12.3.15 Email Re: Planned meeting next week)
47. Defendants' Second Amended Answers to Plaintiff's First Interrogatories, Answer to Interrogatory No. 9

STEVENS & LEE

Dated: July 25, 2018

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